

EXHIBIT “A”



Service of Process Transmittal Summary

TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE I STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: Process Served in Georgia

FOR: WALMART INC. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: BYRD VERONICA // To: WALMART INC.

DOCUMENT(S) SERVED: Attachment(s), Summons, Complaint, Certificate(s)

COURT/AGENCY: Chatham County - Superior Court, GA
Case # SPCV2200500WA

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 05/09/2020 - 6000
Ogeechee Rd. in Savannah, Georgia

PROCESS SERVED ON: The Corporation Company (FL), Cumming, GA

DATE/METHOD OF SERVICE: By Process Server on 05/10/2022 at 14:41

JURISDICTION SERVED: Georgia

APPEARANCE OR ANSWER DUE: Within 30 days after service, exclusive of the day of service

ATTORNEY(S)/SENDER(S): Ashley Black
The Black Firm LLC
950 Herrington Rd., Suite C-114
Lawrenceville, GA 30044
678-537-7833

ACTION ITEMS: CT has retained the current log, Retain Date: 05/11/2022, Expected Purge Date:
05/21/2022
Image SOP

REGISTERED AGENT CONTACT: The Corporation Company (FL)
106 Colony Park Drive
STE 800-B
Cumming, GA 30040
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT



CT Corporation
Service of Process Notification

05/10/2022

CT Log Number 541553787

disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Process Server Sign-in Log for Forsyth County, GA

770-887-7761

DATE: 05/10/2022

	COMPANY NAME BEING SERVED (Please Print legibly)	Case #	TIME	Agency	S.O. ref #
1	WALMART INC	22MGC-1654	10AM	FCSO	51020
2	WALMART INC	22MGC-1688	10AM	FCSO	51021
3	WALMART INC	SPCV22-00500-WA	10AM	FCSO	51037
4	WALMART INC	22EV002539	10AM	FCSO	51025
5	WALMART STORES EAST LP	22EV002539	10AM	FCSO	51024
6	WALMART STORES EAST LP	22MGC-1652	10AM	FCSO	51049
7	WALMART STORES EAST LP	22MGC-1651	10AM	FCSO	51046
8	WALMART STORES EAST LP	22MGC-1648	10AM	FCSO	51045
9	WALMART STORES EAST LP	22SC-0759-B	10AM	FCSO	51036
10	THE CORPORATION COMPANY	22MGC-1528	10AM	FCSO	51029
11	FEDEX GROUND PACKAGE SYSTEM INC	22MGC-1529	10AM	FCSO	51026
12	FEDEX GROUND PACKAGE SYSTEM INC	22MGC-1653	10AM	FCSO	51047
13	HCA PHYSICIAN SERVICES INC	22MGC-1737	10AM	FCSO	51019
14	KIA GEORGIA INC	22MGC-1650	10AM	FCSO	51048
15			10AM	FCSO	
16			10AM	FCSO	
17			10AM	FCSO	
18			10AM	FCSO	
19			10AM	FCSO	
20			10AM	FCSO	
21			10AM	FCSO	

TOTAL PER PAGE: 14

TOTAL FOR THE DAY:

PAGE # of

Civil Action No. SPCV22-00500-WA

Date Filed 4-29-2022

Superior Court ☐ Magistrate Court ☐
 State Court ☐ Probate Court ☐
 Juvenile Court ☐

Georgia, OTHER COUNTY

Attorney's Address

Veronica Byrd
11908 Carson lake Dr. W
Jacksonville, FL 32221

Veronica Byrd

Plaintiff

vs.

Wal-Mart Inc

Name and Address of Party to be Served.

Walmart Inc
106 Colony Park Drive SE 800-B
Cumming, GA 30040

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows: age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

Served the defendant corporation _____ a corporation
☒ by leaving a copy of the within action and summons with manager _____ in charge of the office and place of doing business of said Corporation in this County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.

This 10 day of may, 2022

J. J. J.

DEPUTY

IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA

Veronica Byrd

11908 Carson Lake Dr W

Jacksonville, FL 32221

PLAINTIFF

VS.

Wal-Mart Inc

106 Colony Park Drive Ste. 800-B

Cumming, GA, 30040-2794

DEFENDANT

CIVIL ACTION SPCV22-00500-WA
NUMBER _____

SUMMONS

TO THE ABOVE NAMED DEFENDANT:


You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney whose name and address is:

an answer to the complaint which is herewith served upon you, within 30 days after service of summons upon you, exclusive of the day of service. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint.

This 29th day of April, 2022

TAMMIE MOSLEY
Clerk of Superior Court
CHATHAM COUNTY

By


Deputy Clerk

IN CHATHAM SUPERIOR COURT

_____ TERM _____

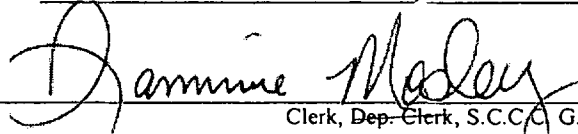
Veronica Byrd

VS.

Wal-Mart Inc

ORIGINAL

Filed in the Clerk's Office this 29th
day of April, 2022


Clerk, Dep. Clerk, S.C.C., GA

Ashley J. Black

PLAINTIFF'S ATTORNEY

IN THE SUPERIOR COURT OF CHATHAM COUNTY

VERONICA BYRD,

Plaintiff,

VS.

WAL-MART INC,

Defendant.

CIVIL ACTION 25

FILE NO. SPCV22-00500-WA

COMPLAINT FOR DAMAGES
AND DEMAND FOR JURY TRIAL

COMES NOW Plaintiff VERONICA BYRD, by and through the undersigned
counsel of record, and hereby files this Complaint for Damages and Demand for Jury
Trial, showing the Court as follows:

PARTIES, JURISDICTION, VENUE AND SERVICE OF PROCESS

1.

Plaintiff VERONICA BYRD is a citizen and resident of Florida, and by filing this Complaint the Plaintiff is subject to the jurisdiction and venue of this Court.

2.

Defendant WAL-MART INC is a corporation and has a registered agent THE CORPORATION (FL) at 106 Colony Park Drive Ste. 800-B, Cumming, GA, 30040-2794, where they may be served with legal process.

3.

Venue is proper in this Court pursuant to O.C.G.A. §9-10-93, and other applicable law because Defendant WAL-MART INC is a tortfeasor in this action and the tortious act and injury occurred at the store location 6000 Ogeechee Road Savannah, GA 31419, real property located in Chatham County, Georgia.

SUBSTANTIVE FACTS

5.

On May 9, 2020, Ms. VERONICA BYRD (“Ms. Byrd”) was a patron at a Wal-Mart store located at 6000 Ogeechee Rd. in Savannah, Georgia.

6.

While on their premises, Ms. Byrd ventured to the produce department to purchase groceries.

7.

While perusing the produce section, Ms. Byrd walked through a puddle of water and immediately slid. Ms. Byrd was unable to regain control and steady herself before her feet folded under her and she landed on her tailbone.

8.

As a result, Ms. Byrd suffered severe bruising and injuries to her left leg, shin, and ankle. Immediately after, Ms. Byrd began to have significant difficulty walking.

9.

Ms. Byrd was transported to St. Joseph/Candler Hospital via ambulance.

10.

VERONICA BYRD also experienced mental and emotional pain as she came to terms with the fact that she will never make a full recovery.

12.

Following VERONICA BYRD'S examination and diagnosis, she followed the recommended course of treatment, which included chiropractic care, surgical procedures, and physical therapy.

13.

The claims asserted by Plaintiff against Defendant in this civil action arise out of this premise negligence on May 9, 2020.

14.

As a proximate cause of the negligent acts and/or omissions of WAL-MART INC set forth above, individually, VERONICA BYRD suffered conscious fright, shock, pain and suffering and injury to her person.

COUNT ONE: LIABILITY OF WAL-MART INC

15.

Paragraphs 1 through 14 above are incorporated by reference as if set forth fully herein.

16.

As a business operator in this state, WAL-MART INC owed duties of care to all invitees and patrons, including VERONICA BYRD. WAL-MART INC breached their duties of care and was negligent and is liable for the following tortious acts and omissions, which include, but are not necessarily limited to, the following:

- a. In failing to make premises and approaches safe and clear or, if reasonable and proper observations were made, failing to act thereon;
- b. In failing to take reasonable care of the store layout and navigation accessibility.
- c. In failing to observe or undertake the necessary precautions to keep the premises dry and clear of hazards;
- d. In failing to notify customers and patrons of the hazard prior to any and all injuries sustained;
- e. In committing this negligent and reckless acts and omissions as may be shown by the evidence and proven at trial.

17.

The breaches of the duties owed to VERONICA BYRD by WAL-MART INC, as set out in Paragraph 16 above, were a proximate cause of the negligence of WAL-MART INC and proximately resulted in the painful injuries to VERONICA BYRD.

18.

WAL-MART INC is liable for the injuries and damages VERONICA BYRD suffered as a proximate cause of Defendant's negligence, which damages will be determined by the enlightened conscience of the jury based upon the evidence at trial.

COUNT TWO: INFLICTION OF EMOTIONAL DISTRESS

19.

VERONICA BYRD incorporates by reference, as if set forth fully herein, each and every allegation contained in paragraphs 1 through 18.

20.

VERONICA BYRD sustained direct and physical impact and physical injuries as a result of the negligence of WAL-MART INC.

21.

As a direct and proximate result of the negligence of WAL-MART INC, VERONICA BYRD suffered severe mental distress from serious physical injury and seeks recovery for that mental and emotional distress in an amount determined by the enlightened conscience of the jury at trial.

DAMAGES CLAIMED

22.

Paragraphs 1 through 21 above are incorporated by reference as if set forth fully herein.

23.

VERONICA BYRD claims general damages against WAL-MART INC for all elements of pain and suffering, physical and mental injury, including emotional shock, fright and physical pain endured by Plaintiff, in an amount determined by the enlightened conscience of the jury after hearing the evidence at trial.

24.

Plaintiff also claims special damages for any medical expenses and property damage incurred on her own behalf in an amount which reflects the reasonable value of those services and property as established by the evidence at trial.

PRAYER FOR RELIEF

25.

WHEREFORE Plaintiff prays for the following relief:

- (a) That summons issue requiring the Defendant to appear as provided by law to answer this Complaint;
- (b) That Plaintiff have a trial by jury;
- (c) That Plaintiff recover all compensatory damages for the liability of Defendant claimed in the paragraphs above, and any other;
- (d) That all costs be cast against the Defendant; and
- (e) For such other and further relief as the Court shall deem just and appropriate.

PLAINTIFF HEREBY DEMANDS TRIAL BY JURY.


Respectfully submitted on this 26th day of April, 2022.

/s/Ashley Black
Ashley Black, ESQ.
Bar No. 975456
ATTORNEY FOR PLAINTIFF

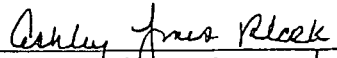
The Black Firm LLC
950 Herrington Rd. Suite C-114
Lawrenceville, GA 30044
ablack@theblackfirm.com
(P) 678-537-7833

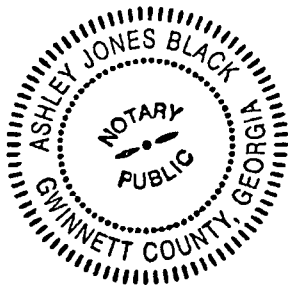
Verification

PERSONALLY appeared, Veronica Byrd, affiant, before the undersigning attesting officer authorized by law to administer oaths, and who, after first being duly sworn, deposes and states that the facts contained in the within and foregoing are true and correct to the best of affiant's personal knowledge and belief.


Veronica Byrd, Affiant

Sworn and subscribed
Before me this 26th day of April 2022.

 Notary Public
My commission expires: 1/7/2023



**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

VERONICA BYRD,)	
)	
Plaintiff,)	
)	CIVIL ACTION
vs.)	FILE NO. <u>SPCV22-00500-WA</u>
)	
WAL-MART INC,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing PLAINTIFF'S COMPLAINT FOR DAMAGES upon all parties to this matter by depositing a true copy of the same in the U.S. Mail, in an envelope with sufficient postage affixed thereon, and addressed as follows:

WAL-MART INC
702 Southwest 8th Street
Bentonville, AR 72716

&

THE CORPORATION (FL)
106 Colony Park Drive Ste. 800-B
Cumming, GA, 30040-2794

Respectfully submitted this 26th day of April, 2022.

The Black Firm

/s/Ashley Black

Ashley Black, ESQ.

Bar No. 975456

ATTORNEY FOR PLAINTIFF

The Black Firm LLC
950 Herrington Rd. Suite C-114
Lawrenceville, GA 30044
ablack@theblackfirm.com
(P) 678-537-7833

General Civil and Domestic Relations Case Filing Information Form☒ Superior or ☐ State Court of Chatham County**For Clerk Use Only**Date Filed 4/29/2022
MM-DD-YYYYCase Number SPCV22-00500-WA**Plaintiff(s)**Byrd Veronica
Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

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Last First Middle I. Suffix Prefix

Defendant(s)Wal-Mart Inc.
Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney Ashley Black State Bar Number 975456 Self-Represented ☐

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contempt/Modification/Other Post-Judgment
☐ Contract
☐ Garnishment
☐ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Dissolution/Divorce/Separate Maintenance/Alimony
☐ Family Violence Petition
☐ Modification
☐ Custody/Parenting Time/Visitation
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

- ☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

RULE 3.2 CERTIFICATION AND STANDING ORDER NOTICE

Pursuant to rules 3.2 and 3.4 of the Uniform Superior Court Rules, I hereby certify that:

(CHECK ONE)

☒ no case has heretofore been filed in the Superior Court of the Eastern Judicial Circuit involving substantially the same parties or substantially the same subject matter or substantially the same factual issues which would require the petition-pleading to be specifically assigned to the judge whom the original action was or is assigned.

OR

☐ this petition-pleading involves substantially the same parties or substantially the same subject matter or substantially the same factual issues as in case # _____.

Veronica Byrd _____ (Plaintiff) vs. Wal-Mart Inc _____ (Defendant)

This 29th day of April, 20 22.

Ashley J. Black/ Veronica Byrd Attorney/Plaintiff

Notice of Eastern Judicial Circuit Standing Orders

YOU MUST SERVE THIS NOTICE UPON THE OPPOSING PARTY together with the initial filing of suit, counterclaim, crossclaim or interpleader. The Superior Court has adopted the following STANDING ORDERS which may apply to you and which may affect your ability to obtain a hearing:

1. **MANDATORY MEDIATION ORDER**, effective January 3, 2011: This order requires parties to mediate their case prior to the pretrial conference or trial. Certain limited cases are exempt from the mediation requirement. Please secure a copy of the mediation order and determine if it applies to your case.
2. **ORDER ON PRODUCTION OF DOCUMENTS**, effective March 15, 2002 and reinstated January 3, 2011: This order applies to all domestic cases in which temporary or permanent financial relief is sought. The order requires the parties in such cases to exchange certain documents listed in the order within a specified time frame. A copy of the production of documents order must be served upon the defendant together with the complaint and summons.
3. **TRANSITIONAL PARENTING SEMINAR ORDER**, effective March 10, 2010 and reinstated January 3, 2011: This order requires the parties in certain domestic cases involving the interest of children under 18 years of age to complete the "Transitional Parenting Seminar". Please secure a copy of the mediation order and determine if it applies to your case.

COPIES OF THE STANDING ORDERS ARE AVAILABLE AT THE OFFICE OF THE CLERK OF SUPERIOR COURT OR AT:

http://www.chathamcounty.org/departments_freeform_T7_R132.html

e-Filed in Office
Tammie Mosley
Clerk of Superior Court
Chatham County
Date: 6/9/2022 2:26 PM
Reviewer: JN

IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA

VERONICA BYRD,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	FILE NO. SPCV22-00500-WA
WALMART, INC.,)	
)	
)	
)	
Defendants.)	

ANSWER AND DEFENSES TO PLAINTIFF’S COMPLAINT

COME NOW, Defendant Walmart, Inc. and files this Answer and Defenses to Plaintiff’s Complaint and show the Court as follows:

First Defense

Pending additional investigation and discovery, Plaintiff’s Complaint, taken as a whole, may fail to state a claim against Defendant upon which relief may be granted.

Second Defense

Defendant shows that Walmart, Inc. was not involved in the day-to-day operation of the Walmart store at issue. While Defendant denies liability, Defendant states that Wal-Mart Stores East, LP was the entity involved in the day-to-day operation of the Walmart store at issue. Defendant requests that Plaintiff voluntarily dismiss Walmart, Inc. and substitute the correct entity.

Third Defense

Pending additional investigation and discovery, Defendant affirmatively preserves any and all defenses based on the doctrine of laches and/or the applicable statute of limitations.

Fourth Defense

Pending additional investigation and discovery, Defendant states that Plaintiff's alleged injuries and damages were caused or contributed to by Plaintiff's own actions.

Fifth Defense

Defendant denies that Defendant or Defendant's agents or employees were negligent in any way in connection with the incident which is the subject of this litigation.

Sixth Defense

Defendant breached no duty owed to Plaintiff.

Seventh Defense

Plaintiff may not recover against Defendant because no act or omission of Defendant was the legal cause or the proximate precipitating cause of Plaintiff's alleged injuries and damages.

Eighth Defense

Pending further investigation and discovery, Defendant asserts the defenses of contributory and comparative negligence.

Ninth Defense

Plaintiff may not recover against Defendant due to Plaintiff's equal or superior knowledge of any condition which she alleges resulted in this event.

Tenth Defense

Plaintiff failed to exercise ordinary care for her own safety.

Eleventh Defense

Defendant denies any and all allegations regarding negligent inspection and failure to warn.

Twelfth Defense

Plaintiff is not entitled to any special damages to the extent that Plaintiff has failed to specifically plead them in accordance with O.C.G.A. § 9-11-9(g).

Thirteenth Defense

Plaintiff is not entitled to attorney's fees, expenses, post-judgment interest, or pre-judgment interest under the facts of this case. Further, Defendant preserves all rights against Plaintiff to the extent these claims are asserted without any justifiable basis in fact or law. If Plaintiff's claims are determined to be false or fraudulent, Defendant reserves the right to seek all sanctions against all persons allowed by law.

Fourteenth Defense

Pending further investigation and discovery, Defendant reserves the right to assert all affirmative defenses available under the Georgia Civil Practice Act.

Fifteenth Defense

In answer to the specific allegations of Plaintiff's Complaint, Defendant shows the Court as follows:

PARTIES, JURISDICTION, VENUE AND SERVICE OF PROCESS

1.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph one of the Complaint.

2.

Admitted. Defendant incorporates its Second Defense.

3.

Defendant admits that the incident at issue took place at the Walmart store located at 6000 Ogeechee Road, Savannah, Georgia 31419. Defendant denies as pled the allegations of paragraph 3 and states that other courts have jurisdiction as well.

SUBSTANTIVE FACTS

5.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph five of Plaintiff's complaint.

6.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph six of Plaintiff's complaint.

7.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph seven of Plaintiff's complaint. Defendant denies any allegations or implication of negligence or liability.

8.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph eight of Plaintiff's complaint and places Plaintiff on strict proof of same. Defendant denies any allegations or implications of negligence or liability.

9.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph nine of Plaintiff's complaint.

10.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph ten of Plaintiff's complaint and places Plaintiff on strict proof of same. Defendant denies any allegations or implications of negligence or liability.

12.

At this time, Defendant is without sufficient information to admit or deny the allegations of paragraph twelve of Plaintiff's complaint

13.

Defendant denies the allegations of paragraph thirteen of Plaintiff's complaint.

14.

Defendant denies the allegations of paragraph fourteen of Plaintiff's complaint.

COUNT ONE: LIABILITY OF WAL-MART INC

15.

Defendant realleges and incorporates its response to paragraphs 1 through 14 of Plaintiff's Complaint as if fully set forth herein.

16.

Defendant states that duties are set by law and Defendant denies that Plaintiff has set forth an accurate or complete description of the law relevant to this issue. Defendant denies that it breached any duty to Plaintiff, denies any inference or allegation of liability and negligence, and denies the allegations contained in sub-paragraphs (a) through (e) of paragraph 16 of Plaintiff's Complaint.

17.

Defendant denies that it breached any duty owed to Plaintiff and denies the remaining allegations contained in paragraph seventeen of Plaintiff's Complaint.

18.

Defendant denies the allegations in paragraph eighteen of Plaintiff's Complaint.

COUNT TWO: INFLICTON OF EMOTIONAL DISTRESS

19.

Defendant realleges and incorporates its response to paragraphs 1 through 18 of Plaintiff's Complaint as if fully set forth herein.

20.

Defendant denies the allegations of paragraph twenty of Plaintiff's Complaint.

21.

Defendant denies the allegations of paragraph twenty-one of Plaintiff's complaint.

DAMAGES CLAIMED

22.

Defendant realleges and incorporates its response to paragraphs 1 through 21 of Plaintiff's Complaint as if fully set forth herein.

23.

Defendant denies the allegations of paragraph twenty-three and denies that it owes any of the damages identified in this paragraph.

24.

Defendant denies the allegations of paragraph twenty-four as pled and denies that it owes any of the damages identified in this paragraph.

PRAYER FOR RELIEF

25.

Defendant denies all allegations and claims asserted in this paragraph and denies that it is liable to Plaintiff in any respect.

DEFENDANTS HEREBY DEMAND TRIAL BY JURY OF TWELVE REGARDING ANY ISSUES NOT SUBJECT TO SUMMARY ADJUDICATION.

Having fully answered, Defendant prays that it be discharged with all costs cast against Plaintiff.

This 9th day of June, 2022.

DREW, ECKL & FARNHAM, LLP

/s/ Ann H. Searcy

Leslie Becknell

Georgia Bar No. . 046320

Ann H. Searcy

Georgia Bar No. 633302

Attorney for Defendants

777 Gloucester Street
Suite 305
Brunswick, GA 31520
(912) 280-9662
LBecknell@deflaw.com
Searcya@deflaw.com

CERTIFICATE OF SERVICE

This is to certify that I have this day forwarded, via United States Mail, postage prepaid, and statutory electronic service a true and correct copy of the foregoing *Answer and Defenses to Plaintiff's Complaint* to the following counsel of record, addressed as follows:

Ashley Black
The Black Firm LLC
950 Herrington Rd. Suite C-114
Lawrenceville, Georgia 30044
ablack@theblackfirm.com

This 9th day of June, 2022.

DREW, ECKL & FARNHAM, LLP

/s/ Ann H. Searcy
Ann H. Searcy
Georgia Bar No. 633302
Attorney for Defendant

777 Gloucester Street
Suite 305
Brunswick, GA 31520
(912) 280-9662
Searcya@deflaw.com